

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA
CRIMINAL DIVISION
VENUE: OAKLAND

FILED

08 JAN 17 PM 2:13

00021

UNITED STATES OF AMERICA,

v.

CW

ROBERT THOMAS DOYLE,

DEFENDANT.

INDICTMENT

Indict

A true bill.

James E. Warren
Foreman

Filed in open court this 17 day of

JANUARY

2008

James E. Warren
Clerk

Bail, \$

no bail arrest warrant
Sharon D. Laperle

Submit by Email

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**18 USC § 287 - 34 counts
False Claims☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony**PENALTY:**18 USC § 287 - 5 yrs impris., \$250,000 fine, 3 years superv.
rel., \$100 assessment**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

INTERNAL REVENUE SERVICE

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW
DOCKET NO.MAGISTRATE
CASE NO.

Name and Office of Person

Furnishing Information on JOSEPH P. RUSSONEILLO
THIS FORM☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned)

THOMAS MOORE, AUSA, TAX DIV.

Name of District Court and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

08 JAN 17 PM 2:13

DEFENDANT - U.S.ROBERT THOMAS DOYLE
CLERK, U.S. DISTRICT COURT
OF CALIFORNIA

DISTRICT COURT NUMBER

CW

DEFENDANT**IS NOT IN CUSTODY**1) ☒ Has not been arrested, pending outcome this proceeding.
If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)

NORTHERN DISTRICT OF CALIFORNIA

IS IN CUSTODY4) ☐ On this charge5) ☐ On another conviction6) ☐ Awaiting trial on other charges☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of Institution

Has detainer
been filed?☐ Yes
☐ NoIf "Yes"
give date
filed**DATE OF
ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS*☒ WARRANT Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: _____

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments: _____

FILED

08 JAN 17 PM 2:14

RECEIVED CLERKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSEPH P. RUSSONIELLO (CSBN 44332)
United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT THOMAS DOYLE,

Defendant.

No.

INDICTMENT

VIOLATIONS: 18 U.S.C. §287 - False
Claims to United States Agency

OAKLAND VENUE

CW

INDICTMENT

The Grand Jury charges:

COUNTS ONE THROUGH THIRTY FOUR (18 U.S.C. § 287 - False Claims)

On or about the dates set forth below, in the Northern District of California, the defendant,

ROBERT THOMAS DOYLE,

then a resident of Oakland, California, did make and present to the United States Treasury

Department the claims against the United States, specified below, which claims he knew to be

false, fictitious or fraudulent, by preparing or causing to be prepared U.S. Individual Income Tax

Returns [Forms 1040] which were presented for payment to the United States Treasury

Department, through the Internal Revenue Service, through paper filing, which claims defendant

DOYLE then and there well knew were false, fictitious or fraudulent.

Count	Date Of Offense On Or About	Taxpayer	Calendar Tax Year	Amount Falsely Claimed as a Refund on Form 1040
1	March 19, 2004	D. C.	2000	\$1,809
2	August 17, 2004	L. B.	2001	\$2,476
3	March 19, 2004	D C.	2001	\$1,895
4	July 13, 2004	C. J.	2001	\$3,990
5	June 3, 2004	L. J.	2001	\$2,450
6	June 22, 2004	L.W.	2001	\$2,428
7	September 19, 2004	A.W.	2001	\$1,077
8	July 23, 2004	R.W.	2001	\$1,284
9	May 31, 2005	F. A.	2002	\$2,299
10	June 2, 2004	C. B.	2002	\$3,850
11	March 19, 2004	D.C.	2002	\$1,956
12	July 30, 2004	J.G.	2002	\$1,312
13	July 12, 2004	C.J.	2002	\$3,796
14	June 3, 2004	L.J.	2002	\$2,560
15	June 30, 2004	L.P.	2002	\$4,349
16	June 21, 2005	T.S.	2002	\$2,231
17	June 22, 2004	L.W.	2002	\$2,501
18	May 27, 2004	R.W.	2002	\$2,506
19	September 8, 2004	R.W.	2002	\$1,511
20	May 31, 2005	F.A.	2003	\$2,268
21	June 13, 2004	V.B.	2003	\$1,491
22	June 2, 2004	C.B.	2003	\$3,858
23	April 15, 2004	D.C.	2003	\$2,027
24	July 30, 2004	J.G.	2003	\$1,905
25	September 13, 2004	J.G.	2003	\$3,077
26	August 20, 2004	C.J.	2003	\$4,399
27	April 15, 2004	L.J.	2003	\$2,414

28	June 30, 2004	L.P.	2003	\$4,453
29	June 21, 2005	T.S.	2003	\$2,576
30	April 15, 2004	L.W.	2003	\$2,547
31	May 27, 2004	R.W.	2003	\$2,547
32	May 31, 2005	F.A.	2004	\$2,318
33	April 15, 2005	V.B.	2004	\$3,065
34	June 21, 2005	T.S.	2004	\$2,666

All in violation of Title 18, United States Code, Section 287.

A True Bill

Dated: 1-17-2008


FOREPERSON

JOSEPH P. RUSSONIELLO
United States Attorney


BRIAN STRETCH
Chief, Criminal Section

Approved as to Form:


THOMAS MOORE
Assistant United States Attorney